

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

SCOTT TRAUDT,

Plaintiff,

v.

ARI RUBENSTEIN, GTS SECURITIES
LLC, GTS EQUITY PARTNERS LLC,
GTS EXECUTION SERVICES LLC,
CHARLES W. SCHWAB AND CO. INC.,
SCHWAB HOLDINGS, INC., and
FINANCIAL INDUSTRY
REGULATORY AUTHORITY,

Defendants,

and

GARY GENSLER, US SECURITIES
AND EXCHANGE COMMISSION,

Respondents.

Docket No.: 2:24-cv-782

Judge Christina Reiss

**THE GTS DEFENDANTS' PARTIAL RESPONSE IN OPPOSITION TO
PLAINTIFF'S "UNOPPOSED" REQUEST FOR FIVE EXTRA PAGES**

The GTS Defendants respectfully submit this Partial Response to Plaintiff's (unsigned) Motion of earlier today, Dkt. No. 120, to clarify the nature of their agreement with Mr. Traudt as to the length of his forthcoming Reply in support of his Motion to Amend. Specifically, earlier today, Mr. Traudt contacted the GTS Defendants' counsel stating, "I need an extra 5 pages for my reply. Do you agree?" The GTS Defendants agreed.

Mr. Traudt's "Unopposed" Motion is inconsistent with what the GTS Defendants agreed. While Mr. Traudt relies upon Local Rule 7(a)(4)(A) to claim a base entitlement to 25 pages, absent an extension, that is the rule applicable to non-reply briefs concerning dispositive motions. His Motion to Amend, Dkt. No. 112, however, is not a dispositive motion, nor have the GTS Defendants filed a dispositive motion to which he is filing a response. Rather, he is filing a Reply

in support of his Motion to Amend, Dkt. No. 112. As such, Local Rule 7(a)(5)(B) supplies an ordinary page limit of 10 pages.

Nonetheless and consistent with what the parties agreed this morning, the GTS Defendants agree that he may have five extra pages, for a total of 15 pages, for his reply.

Dated: January 8, 2025

Respectfully submitted,

/s/ Jonathan R. Voegele

Jonathan R. Voegele
MORRIS KANDINOV LLP
4915 Mountain Rd.
Stowe, VT 05672
Tel.: 332-910-5229
aaron@moka.law
jonathan@moka.law

Christopher J. Barber
Stephen A. Fraser
WILLIAMS BARBER & MOREL LTD.
233 S. Wacker, Ste. 6800
Chicago, IL 60606
Tel.: 312-443-3200
cjb@williamsbarbermorel.com
saf@williamsbarbermorel.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed electronically today via the Court's CM/ECF Electronic Filing System. A Notice of Electronic Filing will be sent by e-mail to all parties via operation of the Court's CM/ECF Electronic Filing System or by mail to anyone unable to accept electronic filing as indicated on the Notice.

Dated: January 8, 2025

/s/ Jonathan R. Voegele